

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

2015 OCT 15 PM 3:32

CLERK'S OFFICE
AT BALTIMORE

UNITED STATES OF AMERICA

v.

WILLIAM H. STEINHAUS IV,
a/k/a "BadDad4682"
a/k/a "Naughty Daddy"

Defendant

CRIMINAL NO. CG B 15-0544

(Sexual Exploitation of a Child,
18 U.S.C. § 2251(a); Distribution of
Child Pornography, 18 U.S.C.
§ 2252(a)(2) and (b)(1); Forfeiture,
18 U.S.C. § 2253)

INDICTMENT

COUNTS ONE AND TWO
(Sexual Exploitation of a Child)

The Grand Jury for the District of Maryland charges that:

Introduction

At all times material to this Indictment:

1. Defendant **WILLIAM H. STEINHAUS IV** ("STEINHAUS"), born in April, 1982, was a resident of Brunswick, Frederick County, Maryland
2. The name "Jane Doe" is the pseudonym of a minor girl. Jane Doe was approximately two years of age.

Kik Messaging App

3. Kik is a free instant messaging application for mobile devices. Kik uses a smartphone's data plan or Wi-Fi to transmit and receive messages. Kik also allows users to share photos, videos, sketches, mobile webpages, and other content. Kik requires users to register a username.

4. On or about December 7, 2014, **STEINHAUS**, created a Kik user account with the

username "baddad4682" and the display name "Naughty Daddy." In association with his "baddad4682" account **STEINHAUS** provided Kik his true birth date. **STEINHAUS** listed his email account with Kik as "baddad4682@yahoo.com".

5. Between on or about December 8 and December 9, 2014, **STEINHAUS** engaged in a number of sexually explicit conversations with other Kik users regarding their shared sexual interest in prepubescent children.

6. Between on or about December 8 and December 9, 2014, **STEINHAUS** took pictures of Jane Doe engaged in sexually explicit conduct, as defined by 18 U.S.C. § 2256(2)(A), and distributed them to approximately 25 other Kik users.

7. **STEINHAUS** produced all of the images of Jane Doe engaged in sexually explicit conduct using his Apple iPhone or iPad, both of which were manufactured outside of Maryland, and had travelled in interstate and foreign commerce.

Kik Messages with User 1

8. On or about December 8, 2014, a Kik user identified here as "User 1" initiated a Kik conversation with **STEINHAUS**. Between on or about December 8 and December 9, 2014, **STEINHAUS** and User 1 exchanged approximately 290 messages.

9. On or about December 8, 2014, **STEINHAUS** and User 1 discussed how **STEINHAUS** can best engage in sexual abuse of Jane Doe. User 1 stated "[w]ell you could get hard then have her sit on your lap, if she tries to figure out what it is show her." In response, **STEINHAUS** sent User 1 an image of his erect penis laying on Jane Doe's clothed crotch and stated "[a]lready did that."

10. The same day, User 1 advised **STEINHAUS** to "[h]ave it out around her a lot." In response, **STEINHAUS** sent User 1 an image of Jane Doe's hand holding **STEINHAUS'** erect penis. **STEINHAUS** also sent User 1 several images of Jane Doe's bare vagina.

11. On or about December 8, 2014, **STEINHAUS** sent User 1 a picture of his erect penis directly above Jane Doe's bare vagina. User 1 asked **STEINHAUS** "[h]ave you tried sliding it in," and **STEINHAUS** responded "[t]oo tight. And I might hurt her or cause damage." **STEINHAUS** later stated "I rub her mound."

12. On or about December 8, 2014, **STEINHAUS** sent User 1 an image of a brown couch draped with a blue towel and messages stating "That's where tw[sic] assault will happen" and "Lol." **STEINHAUS** then sent User 1 approximately 10 images of Jane Doe. In one of the images, Jane Doe is bottomless and lying on a blue towel draped over a brown couch as **STEINHAUS** uses his fingers to expose her vagina to the camera. In one of the images **STEINHAUS** placed his erect penis on Jane Doe's bare vagina. In another of the images Jane Doe's hand is on **STEINHAUS'S** erect penis.

Kik Messages with User 2

13. On or about December 8, 2014, **STEINHAUS** initiated a Kik conversation with a Kik user identified here as "User 2." On that day, **STEINHAUS** and User 2 exchanged approximately 293 messages.

14. During their conversation **STEINHAUS** told User 2 that he was 32 years old and lived in Maryland. **STEINHAUS** stated that he had "licked" Jane Doe "a few times" and sent User 2 an image of Jane Doe's lower body, wearing a diaper, with her legs spread and the camera focused on her crotch.

15. User 2 proceeded to send **STEINHAUS** several images of prepubescent girls engaged in sexually explicit conduct. In response, **STEINHAUS** stated "I am showing her the pics. She smiles and laughs."

16. In response to User 2 sending him several more images of prepubescent girls engaged in sexually explicit conduct, **STEINHAUS** sent User 2 two images of Jane Doe partially

nude, with the camera focused on her bare vagina.

17. **STEINHAUS** then sent User 2 an image of his erect penis directly above Jane Doe's bare vagina, followed by a message stating "Lol like that? That was from earlier today."

18. On or about December 8, 2014, **STEINHAUS** sent User 2 an image of a brown couch draped with a blue towel and messages stating "That's where the assault is going to happen." **STEINHAUS** then sent User 2 approximately 11 images of Jane Doe including the same image of Jane Doe described in Paragraph 12 above.

Email and Kik Messages with User 3

19. On or about December 8, 2014, **STEINHAUS** used his baddad4682@yahoo.com email account to write an email to an internet user identified here as "User 3." The subject line of **STEINHAUS'** email was "Taboo" and he stated that he was 32 years old and from Frederick.

20. During an exchange of emails, **STEINHAUS** told User 3 that he had access to a two year old girl, and that his Kik username was "baddad4682."

21. On or about December 8, 2014, "User 3" initiated a Kik conversation with **STEINHAUS**. Between on or about December 8 and December 9, 2014, **STEINHAUS** and User 3 exchanged approximately 419 messages.

22. During their Kik conversation, **STEINHAUS** again told User 3 that he was 32 years old and lived in Frederick.

23. Between on or about December 8 and December 9, 2014, **STEINHAUS** sent User 3 approximately 30 images he had taken of Jane Doe. Several of these images showed Jane Doe partially nude, and the images focused on her bare vagina.

24. **STEINHAUS** stated to User 3 "I been showing her videos of little girls sucking." After User 3 asked **STEINHAUS** to show him what he had been showing to Jane Doe, **STEINHAUS** sent User 3 an image he had collected using the internet of a prepubescent girl being

orally penetrated by an adult man.

The Charges

25. On two different occasions on or before December 8, 2014, the exact dates being unknown to the Grand Jury, in the District of Maryland, the defendant,

**WILLIAM H. STEINHAUS IV,
a/k/a "BadDad4682,"
a/k/a "Naughty Daddy,"**

employed, used and coerced Jane Doe to engage in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce, and that visual depiction was produced and transmitted using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer: to wit, **STEINHAUS** used a digital device equipped with a camera to produce visual depictions of Jane Doe engaged in sexually explicit conduct, as described below.

| COUNT | DESCRIPTION |
|--------------|--|
| One | A series of images of Jane Doe wearing a green shirt and lying on a purple sheet engaged in sexually explicit conduct, including wearing a green shirt holding a man's erect penis. |
| Two | A series of images of Jane Doe wearing a yellow shirt and lying on a blue towel on a brown couch engaged in sexually explicit conduct, including wearing a yellow shirt holding a man's erect penis. |

18 U.S.C. § 2251(a)

COUNTS THREE THROUGH SIX
(Distribution of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

1. The allegations of Paragraphs 1 through 24 of Counts One and Two are incorporated here.
2. On or about the dates listed below, in the District of Maryland, the defendant,

WILLIAM H. STEINHAUS IV,
a/k/a "BadDad4682,"
a/k/a "Naughty Daddy,"

did knowingly distribute and attempt to distribute any visual depiction using any means and facility of interstate and foreign commerce, and that had been mailed, shipped and transported in and affecting interstate and foreign commerce, and which contained materials which had been so mailed, shipped and transported, by any means including by computer, and knowingly reproduced any visual depiction for distribution using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and through the mails, the production of which involved the use of a minor engaged in sexually explicit conduct and such depiction-being of such conduct: to wit, **STEINHAUS** used the Kik messaging application to send the users listed below images of Jane Doe engaged in sexually explicit conduct, including but not limited to the images described below.

| COUNT | DATE | RECIPIENT | DESCRIPTIONS OF DISTRIBUTED IMAGES |
|--------------|------------------|------------------|---|
| Three | December 8, 2014 | User 1 | <ul style="list-style-type: none">• Jane Doe's hand on a man's erect penis.• Jane Doe wearing a green shirt lying facing up on a purple sheet. Jane Doe is bottomless, her legs are spread and the camera is focused on her bare vagina.• Jane Doe wearing a green shirt. Jane Doe is bottomless, her legs are spread and a man's erect penis is touching her vagina. |

| COUNT | DATE | RECIPIENT | DESCRIPTIONS OF DISTRIBUTED IMAGES |
|-------|------------------|-----------|---|
| Four | December 8, 2014 | User 2 | <ul style="list-style-type: none"> Jane Doe wearing a green shirt lying facing up on a purple sheet. Jane Doe is bottomless, her legs are spread and a man's erect penis is directly over her vagina. Jane Doe wearing a yellow shirt. She is lying facing down on a blue towel on a brown couch. An adult man's hand is spreading her legs and labia, exposing her vagina to the camera. |
| Five | December 8, 2014 | User 3 | <ul style="list-style-type: none"> A close up image of Jane Doe's bare vagina. Jane Doe lying on a purple sheet. She is bottomless. Her legs are together and lifted above her abdomen. The camera is focused on her bare vagina. |
| Six | December 9, 2014 | User 3 | <ul style="list-style-type: none"> Jane Doe wearing a green shirt lying on a purple sheet. She is bottomless, her legs are spread and the camera is focused on her bare vagina |

18 U.S.C. §§ 2252(a)(2) and (b)(1)

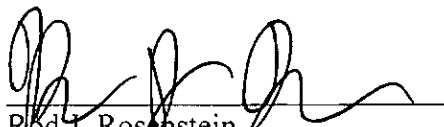
FORFEITURE

As a result of the offenses set forth in Counts One through Six, the defendant,

**WILLIAM H. STEINHAUS, IV,
a/k/a "BadDad4682,"
a/k/a "Naughty Daddy,"**

shall forfeit to the United States his interest in all property, real and personal, (1) that was used, and intended to be used, to commit and to promote the commission of the offenses, including but not limited to (a) An Apple iPhone, IMEI #358814056045638; (b) an Apple iPad 16 GB, S/N DN6GLKCQDFHW; (c) an Apple iPad Mini Model A1432, S/N F4NJLBTQF193 ; (d) an Apple iPad, S/N DMRJMU81F182; and (e) the other computers, mobile devices and digital media seized from his residence on December 9, 2014, as well as any property traceable to such property, or (2) that constitutes and is traceable to gross profits and other proceeds obtained, directly and indirectly, as a result of any the offenses in Counts One through Six.

18 U.S.C. § 2253


Rod J. Rosenstein
United States Attorney

A TRUE BILL:

SIGNATURE REDACTED 

Forfeiture

10 / 15 / 15
Date